

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

Omar Feliciano and Isanette Ayala  
Debtor(s)

v.

William C. Miller Standing Chapter 13 Trustee,  
Creditor

In Re:  
Omar Feliciano and Isanette Ayala

Case No.: 18-10933-MDC

Judge: MDC

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

☐ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

☒ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following  
**(choose one):**

1. ☐ Motion for Relief from the Automatic Stay filed by  
\_\_\_\_\_, creditor.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

OR

- ☒ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for October 25, 2018, at 9:30 AM.

- ☐ Certification of Default filed by creditor,

I am requesting a hearing be scheduled on this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons **(choose one):**

☐ Payments have been made in the amount of \$\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows **(explain your answer):** \_\_\_\_\_

\_\_\_\_\_

☒ Other **(explain your answer):** We will file a modify plan to address all proof of claims and objections.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: October 10, 2018

/s/Omar Feliciano and Isanette Ayala  
Debtor's Signature